

Exhibit H

Amatullah Contractor

July 20, 2022

UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF TEXAS

LA UNION DEL PUEBLO
ENTERO, ET AL.

Plaintiff

V.

GREGORY W. ABBOTT, ET
AL.

Defendant.

§
§
§
§
§
§
§
§
§
§

Civil Action No.
5:21-cv-00844-XR

ORAL DEPOSITION OF
AMATULLAH CONTRACTOR
JULY 20, 2022

ORAL DEPOSITION OF AMATULLAH CONTRACTOR, produced as a witness at the instance of the Defendant and duly sworn, was taken in the above styled and numbered cause on Wednesday, July 20, 2022, from 10:26 a.m. to 1:13 p.m., before DONNA QUALLS, Notary Public in and for the State of Texas, reported by computerized stenotype machine, at the offices of the Texas Justice Center, 4900 Fournace Place, Houston, Texas, pursuant to the Federal Rules of Civil Procedure and any provisions stated on the record or attached hereto.

1 voter who is not eligible for assistance is that the
2 voter's ballot is not counted; isn't that right?

3 MR. VATTAMALA: Objection; form.

4 A. That's right.

5 Q. (BY MR. WASSDORF) And so isn't the obligation
6 to determine eligibility on the voter and not the
7 assistor?

8 MS. CHEN: Objection; form.

9 You can answer.

10 A. The beginning of the oath on page 52, line 26
11 says, "Under the penalty of perjury that the voter I am
12 assisting represented to me that they are eligible to
13 receive assistance," and, therefore, that could be
14 harmful to me because I'm like -- I'm -- I'm taking an
15 oath under penalty of perjury.

16 Q. (BY MR. WASSDORF) You are taking an oath under
17 the penalty of perjury that the voter represented to you
18 that they were eligible for assistance; isn't that
19 correct?

20 A. Yes.

21 Q. Not that they actually are eligible for
22 assistance?

23 A. True.

24 Q. And so if your mother, for example, told you
25 that she was eligible for assistance, then this oath

1 would be accurate, would it not?

2 MR. VATTAMALA: Objection to form.

3 A. Yes.

4 Q. (BY MR. WASSDORF) So the other part of this --
5 and correct me if I'm wrong -- that you are complaining
6 about is starting on line 2 through 4 where it says, "I
7 will confine my assistance to reading the ballot to the
8 voter, directing the voter to read the ballot, marking
9 the voter's ballot or directing the voter to mark the
10 ballot"; is that correct?

11 A. Yes.

12 Q. Handing you what is marked as Exhibit 4.

13 (Exhibit No. 4 was marked.)

14 MS. CHEN: Thank you.

15 MR. WASSDORF: So just for y'all's
16 information, this is an updated manual based on the
17 recent injunction to the provision that we just read. I
18 believe it was produced yesterday.

19 Q. (BY MR. WASSDORF) Ms. Contractor, if you could
20 turn to page 46 of Exhibit 4. So towards the top of the
21 page, it reads here, "On June 6, 2022, the U.S. District
22 Court for the Western District of Texas issued an order
23 in OCA-Greater Houston, et al, versus State of Texas, et
24 al, No. 1:15-cv-00679-RP ('OCA-Greater Houston') a
25 lawsuit challenging several assistance provisions in the